

# EXHIBIT B

## APPENDIX G

**PCT Application WO 00/70436** by Chase et al., anticipates and/or renders obvious, alone or in combination with other prior art identified in Defendants' Invalidity Contentions, one or more asserted claims of the '149 patent. These invalidity contentions are not an admission by Defendants that the accused methods and articles of manufacture, including any current or past versions of such methods, systems, and/or articles of manufacture, are covered by, or infringe, these claims.

'149 Patent Claims	PCT WO 00/70436 ("Chase et al.")
<p>1. An automated computer-implemented method of preparing production data for a print job, the production data including an electronic document defined by a page description language (PDL), the electronic document being stored in a PDL image file, the method comprising:</p>	<p><i>Chase discloses an automated method for preparing production data for a print job, wherein the production data comprises a PDL image file:</i></p> <p>The information from the user includes an indication of a predefined template including layout information for a particular printed article, including at least one area for printing. The graphic layout component uses the predefined template to produce the graphic description file, which is in a format such as Postscript. The instance of the predefined template can also be modified by the user. (change number of lines, type style) etc. (3:13-16.)</p> <p><i>In addition, U.S. Patent No. 6,850,248 to Crosby et al. ("Crosby '248") discloses preparing production data for a print job, wherein the production data includes a PDL image file. See Crosby '248 Chart, Claim 1.</i></p> <p><i>A person of ordinary skill in the art would have been motivated to combine Chase with Crosby '248 based on the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. An exemplary motivation for combining these references is found in Crosby '248's suggestion of using the disclosed distributed imaging system in various e-commerce applications, including those for incorporating photos into personalized products:</i></p>

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	<p>The capability for linking an edit list(s) from a low resolution proxy resultant image provides substantial advantages for e-commerce applications. For example, photo content providers can distribute lower-resolution images for free via the Web or a CD that contain references back to the original high-resolution digital negative (s) that can reside either on a Web site, CD media, or other removable media. Photo Web sharing sites can also use this invention to enable users to link photos, or photo greeting cards (and other compositions such as multi-page albums) to the high resolution image data and an optional "script" within the edit list for rendering of the photo (or card or album) at a higher-resolution. (Crosby '248, 7:55-67.)</p> <p>It should also be noted, this is not limited to greeting cards, but could also be applied to the creation and distribution of albums, calendars, and virtually any other creation that involves incorporation of photographs or other image data into a composition. (Crosby '248, 9:37-41.)</p> <p><i>In addition, U.S. Patent No. 7,042,583 to Wilkins et al. ("Wilkins '583") discloses preparing production data for a print job, wherein the production data includes a PDL image file. See Wilkins '583 Chart, Claim 1.</i></p> <p><i>A person of ordinary skill in the art would have been motivated to combine Chase with Wilkins '583 based on the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. An exemplary</i></p>

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	<p><i>motivation for combining these references is found in Wilkins '583's suggestion of using the disclosed distributed imaging system in various e-commerce applications, including those for incorporating photos into personalized products:</i></p> <p>The capability for linking an edit list(s) from a low resolution proxy resultant image provides substantial advantages for e-commerce applications. For example, photo content providers can distribute lower-resolution images for free via the Web or a CD that contain references back to the original high-resolution digital negative (s) that can reside either on a Web site, CD media, or other removable media. Photo Web sharing sites can also use this invention to enable users to link photos, or photo greeting cards (and other compositions such as multi-page albums) to the high-resolution image data and an optional "script" within the edit list for rendering of the photo (or card or album) at a higher resolution. (Wilkins '583, 7:15-27.)</p> <p><i>In addition, James E. Porter, "Why We Still Need OPI" (GATFWorld Nov./Dec. 1999) ("Porter") discloses preparing production data for a print job, wherein the production data comprises a PDL image file. See Porter Chart, Claim 1.</i></p> <p><i>A person of ordinary skill in the art would have been motivated to combine Chase with Porter based on the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. An exemplary motivation for combining these references is found in U.S. Patent No. 6,650,433 to Keane et al. ("Keane '433"), which discloses the use of OPI</i></p>

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	<p><i>techniques in conjunction with electronic printing systems similar to that of Chase:</i></p> <p>So that the website studio can be quickly downloaded by the customer, in most implementations the graphic elements, e.g., fonts, backgrounds and logos, used in the website studio are stored in a library in the network storage 22, a copy of which is stored at the printing firm information system 29, as will be discussed below. Thus, a graphic element need only be downloaded by the web server to the browser when it is selected by the customer during the design process. The XML file that results from the design process (the customer's print job) will reference the appropriate information in the centrally stored library. The library is replicated at the printing firms, so that the graphic elements can be inserted during RIPing using OPI (Open Prepress Interface) techniques. The library can be distributed periodically using a CD-ROM publication or other distribution approach so that all parties to the system are working from the same library. (Keane '433, 13:11-27.)</p>
(a) creating a still image proxy of the PDL image file;	<p><i>Chase discloses creating a proxy image from the PDL image file:</i></p> <p><i>See FIG. 5.</i></p> <p>The output Postscript file 58 for display to the user on the monitor 22 is processed by a Postscript to graphic converter 60. This Postscript to graphic converter 60 converts the Postscript file to a format which may be sent to and displayed on the monitor 22. In the illustrative</p>

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	<p>embodiment, <u>the Postscript file 58 is converted into a GIF (Graphics Interchange Format) file, although other formats such as JPEG or TIFF can also be produced.</u> In the illustrative embodiment, the postscript to graphic converter 60 is a program called Image Alchemy which converts the Postscript file into a GIF file 62. (7:5-11 (emphasis added).)</p> <p><i>In addition, Crosby '248 discloses creating a low-resolution proxy image from a PDL image file. See Crosby '248 Chart, Claim 1(a).</i></p> <p><i>In addition, Wilkins '583 discloses creating a low-resolution proxy image from a PDL image file. See Wilkins '583 Chart, Claim 1(a).</i></p> <p><i>In addition, Porter discloses creating a still image proxy of the PDL image file. See Porter Chart, Claim 1(a).</i></p>
(b) electronically manipulating an image display of the still image proxy and recording information about the manipulations; and	<p><i>Chase discloses electronically manipulating an image display of the proxy and recording the manipulations:</i></p> <p>The user can modify any of the information and layout, including change font sizes by specifying a percentage increase or decrease of a certain font. This maintained information is also used for producing and displaying a different printed article, and also for ultimately preparing and running the print job for the user. (3:2-6.)</p> <p>The user can make changes in the format layout or other details for the image of the printed article, whereupon the interactive site user interface 30 receives updated</p>

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	<p>information, which is provided to the job processor 34. The job processor 34 then produces a new print image 36 for display back on the monitor 22. Through this cyclic interaction, a user is able to experiment and try variations in a low-pressure environment, and ultimately produce a desired customized article for printing. (5:11-16.)</p> <p>The web site user Interface 30 receives the foreground GIF image 62 and provides it and an background image to the user display or monitor 22. The background is selected by the user selecting a certain paper stock, or if a certain stock is attached to a certain template identifier, that background image will be used. The image size for the background is selected to match the foreground size as defined by the foreground GIF image 62. <b><u>The background image size may be adjusted by tiling a small image to fill in the appropriate size, or by clipping or resizing a background image as appropriate.</u></b> Alternatively, for certain printed articles such as business cards, background images properly sized for business cards may be provided. (7:25-33 (emphasis added).)</p> <p>Upon viewing the displayed image on the display monitor 22, a user can modify the displayed image by editing the previously entered text, or changing the appearance (font, font size, color, spacing etc.). All the previously entered information is maintained by the web site user interface, and available in the data entry fields so the user can easily make changes and adjustments without having to re-enter data. If the user changes to a new article for printing, for example a different business card with a different layout,</p>

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	<p>the previously entered text for printing on the business card does not need to be reentered. Other adjustments are also simple. In the present invention, the font size can be adjusted by specifying a percentage change amount, for example requesting 110%, 75% 150% of the present font size, or requesting for example " 10% larger", "25% smaller" of the present font size. The user can also specify point sizes if desired. (8:3-13.)</p> <p><i>In addition, Crosby '248 discloses manipulating the low-resolution proxy image and recording information about the manipulations in an "edit list." See Crosby '248 Chart, Claim 1(b).</i></p> <p><i>In addition, Wilkins '583 discloses manipulating the low-resolution proxy image and recording information about the manipulations in an "edit list." See Wilkins '583 Chart, Claim 1(b).</i></p> <p><i>In addition, Porter discloses electronically manipulating the image display of the still image proxy and recording information about the manipulations. See Porter Chart, Claim 1(b).</i></p>
<p>(c) using the information about the manipulations to revise the PDL image file so as to match the PDL image file to the manipulations made to the image display of the still image proxy.</p>	<p><i>Chase discloses using information about the manipulations to match a PDL image to the manipulations made to the image display of the proxy:</i></p> <p>After the user has made changes as desired, the information is again sent to the web site user Interface 30, which submits the proper information to the graphical layout engine 52 to produce a new postscript file 58, which is processed as previously described and displayed</p>



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	<p>to the user. (8:14-17.)</p> <p>The graphic layout engine 52 again queries and receives data from the database 54 regarding the template and additionally may include information about various texts to display in various areas and sections of a template as will be described below. The graphical layout engine 52 then produces a Postscript file 44 which is used for preparing a printing plate for the printing process 48. When producing a Postscript file 44 for printing, the graphic layout engine may produce a slightly different Postscript file 44 from the Postscript file 58 for image display, in that it may have a larger border to accommodate spacing around the printing plate for margins and trimming. However, the text and font layout as contained within the Postscript file for printing 44 is substantially identical to the Postscript file for image display 58. (9:1-10.)</p> <p>A template area is configured with rules to display a specific font, in a specific color, with a certain format, leading (spacing) and area filling. The template is stored in the database 54. When a template is uploaded, the descriptions for each area are also uploaded. When the graphical layout engine 52 receives text to print in a certain area, the line is indexed into a specific line in a specific area on a specific template. . . .</p> <p><b><u>The graphical layout engine takes the user supplied information for each area, and produces the output Postscript file 58 based on the template and areas.</u></b> The fonts and layout of each area can be adjusted as desired to</p>

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	<p>override the initial default rules. For example the font may be shrunk by a percentage for one area. (9:26-10:3 (emphasis added).)</p> <p><i>In addition, Crosby '248 discloses using information about manipulations, captured in an "edit list," to revise an original file (e.g., a PDL file) to match the original file to the manipulations made to the image display of the low-resolution proxy image. See Crosby '248 Claim Chart, Claim 1(c).</i></p> <p><i>In addition, Wilkins '583 discloses using information about manipulations, captured in an "edit list," to revise a high-resolution digital negative (e.g., a PDL file) to match the digital negative to the manipulations made to the image display of the low-resolution proxy image. See Wilkins '583 Claim Chart, Claim 1(c).</i></p> <p><i>In addition, Porter discloses using information about manipulations to revise a PDL image file. See Porter Chart, Claim 1(c).</i></p>
2. The method of claim 1 wherein the production data further comprises a predetermined area in which the electronic document must fit, the method further comprising:	See claim 1.
(d) creating a static template that defines the predetermined area and displaying the image display of the still image proxy in association with the template, and	<p><i>Chase discloses using a template defining a predetermined area and displaying the image display of the still image proxy in association with the template:</i></p> <p>The information from the user includes an indication of a predefined template including layout information for a particular printed article, including at least one area for</p>

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	<p>printing. The graphic layout component uses the predefined template to produce the graphic description file, which is in a format such as Postscript. The instance of the predefined template can also be modified by the user. (change number of lines, type style) etc. (3:13-16.)</p> <p>Advantages of the present invention include the feature that an interactive user will see exactly what they will get. <b><u>The displayed image is not an approximation of the printed article, it is an exact replica</u></b> (subject to the limitations of the display monitor, and effects such as raised ink and paper defects and absorption). Ink colors will be properly displayed, as well as artwork and fonts. Discrepancies which are not apparent until the print job is run will not occur. For example, the image display system will not show that a line of text in a certain font will fit correctly, only to have the printer preparing to run the print job be forced to adjust the font size to keep the text from overflowing. <b><u>Users can therefore safely adjust everything from point size and line spacing within boundaries as defined by the article to be printed, and be confident that they are viewing what they will order.</u></b> (3:27-4:3 (emphasis added).)</p> <p>The correct template is loaded into graphical layout engine 52. Then the graphical layout engine 52 processes the template image using the text and font information 32 provided by the user to produce an output image 58. In the illustrative embodiment, the output image 58 is in Postscript file format. (6:30-33.)</p>
step (b) further comprising electronically manipulating the	<i>Chase discloses recording manipulations of the image display in</i>

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image display of the still image proxy in relation to the template and recording information about the manipulations in relation to the template,	<i>relation to the template:</i>  <i>See claim 1(b), supra.</i>
and step (c) further comprising using the information about the manipulations to revise the PDL image file so as to match the PDL image file to the manipulations made to the image display of the still image proxy in relation to the template.	<i>Chase discloses using information about the manipulations to match a PDL image to the manipulations made to the image display of the proxy in relation to the template:</i>  <i>See claim 1(c), supra.</i>
3. The method of claim 2 further comprising:	
(d) inserting the still image proxy and the template into a browser-compatible application program that allows for electronic manipulation of the image display of the still image proxy with respect to the template within a browser.	<i>Chase discloses a browser-compatible application program that allows for electronic manipulation of the image display:</i>  The illustrative embodiment of the present invention is set up to allow users to interactively use the system over the Internet. Users can access a web site, select a printed article such as a business card, enter information and view the results. They can make 25 changes and view the results of those changes. Users can plan and design their own printed materials. They can then place an order, wherein the order will be automatically processed. (3:22-26.)  The user can make changes in the format layout or other details for the image of the printed article, whereupon the interactive site user interface 30 receives updated information, which is provided to the job processor 34. (5:11-13.)
4. The method of claim 3 wherein step (a), (c) and (d) occur at a	<i>Chase discloses a method wherein step (a), (c), and (d) occur at a</i>

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central site, and step (b) occurs at a remote site, the method further comprising:	<i>central site and step (b) occurs at a remote site:</i> <i>See FIGS. 2, 5; claims 1 &amp; 2, supra.</i>
(e) using a public or private network to communicate the browser-inserted still image proxy and the template from the central site to the remote site for manipulation at the remote site, and using a public or private network to communicate the information about the manipulations back to the central site for use in step (c).	<i>Chase discloses a method wherein the central site and remote site communicate over a network:</i> <i>See FIGS. 1-2, 5; claims 1 &amp; 2, supra.</i>  Fig. 1 displays an interactive print job display system 20 according to the present invention. A user interacts with the system 20 via a display system which commonly includes a monitor 22 with an input device such as a keyboard 24 and pointing device such as mouse 26. This display system is readily available in any typical personal computer or work station. The user communicates with the interactive site user interface 30 through a communications link 28. This communications link 28 includes any standard communication link such as modems, networks such as Ethernet and other connections. As will be discussed hereinafter the illustrative embodiment of the present invention uses the Internet with Internet browsing software such as Netscape Navigator running on a computer system with monitor 22 and an interactive web site. (4:25-5:1.)
5. The method of claim 4 wherein the network is a public network, and the public network is the Internet.	<i>Chase discloses a method wherein the central site and remote site communicate over the Internet:</i> <i>See claim 4, supra.</i>
7. The method of claim 2 wherein step (a) further comprises dynamically creating the static template to represent the predetermined area that the electronic document must fit in a	<i>Chase discloses a method wherein the template represents a fixed, predetermined area that the electronic document must fit in</i>

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layout of a physical printed document.	<i>a layout of a physical printed document:</i> <i>See claim 2, supra.</i>
9. The method of claim 2 wherein the manipulations include a change in scaling percentage.	<i>Chase discloses a method wherein the manipulations include a change in scaling percentage:</i> <i>See, claim 2, supra.</i>
10. The method of claim 2 wherein the manipulations include alignment changes of the image display of the still image proxy in relation to the template.	<i>Chase discloses a method wherein the manipulations include alignment changes in relation to the template:</i> <i>See, claim 2, supra.</i>
11. The method of claim 1 wherein the PDL image file is a Postscript or PDF file.	<i>Chase discloses that the PDL image file is a Postscript or PDF file:</i>  The information from the user includes an indication of a predefined template including layout information for a particular printed article, including at least one area for printing. The graphic layout component uses the predefined template to produce the graphic description file, which is <b><u>in a format such as Postscript</u></b> . The instance of the predefined template can also be modified by the user. (change number of lines, type style) etc. (3:13-16 (emphasis added).)
12. The method of claim 1 wherein the still image proxy is a JPEG, GIF, or PNG file.	<i>Chase discloses that the still image proxy is a JPEG, GIF, or PNG file:</i>  The output Postscript file 58 for display to the user on the monitor 22 is processed by a Postscript to graphic converter 60. This Postscript to graphic converter 60

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	<p>converts the Postscript file to a format which may be sent to and displayed on the monitor 22. In the illustrative embodiment, <u>the Postscript file 58 is converted into a GIF (Graphics Interchange Format) file, although other formats such as JPEG or TIFF can also be produced.</u> In the illustrative embodiment, the postscript to graphic converter 60 is a program called Image Alchemy which converts the Postscript file into a GIF file 62. (7:5-11 (emphasis added).)</p>

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'149 Patent Claims	U.S. Patent No. 6,522,418 ("Chase et al.")
25. An article of manufacture for preparing production data for a print job, the production data including an electronic document defined by a page description language (PDL), the electronic document being stored in a PDL image file, the article of manufacture comprising a computer-readable medium holding computer-executable instructions for performing a method comprising:	<i>See claim 1.</i>
(a) creating a still image proxy of the PDL image file;	
(b) electronically manipulating an image display of the still image proxy and recording information about the manipulations; and	
(c) using the information about the manipulations to revise the PDL image file so as to match the PDL image file to the manipulations made to the image display of the still image proxy.	
26. The article of manufacture of claim 25 wherein the production data further comprises a predetermined area in which the electronic document must fit, and the computer-executable instructions perform a method further comprising:	<i>See claim 2.</i>
(d) creating a static template that defines the predetermined area and displaying the image display of the still image proxy in association with the template, and	
step (b) further comprising electronically manipulating the image display of the still image proxy in relation to the	



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'149 Patent Claims	U.S. Patent No. 6,522,418 ("Chase et al.")
template and recording information about the manipulations in relation to the template,	
and step (c) further comprising using the information about the manipulations to revise the PDL image file so as to match the PDL image file to the manipulations made to the image display of the still image proxy in relation to the template.	
27. The article of manufacture of claim 26 wherein the computer-executable instructions perform a method further comprising:	<i>See claim 3.</i>
(d) inserting the still image proxy and the template into a browser-compatible application program that allows for electronic manipulation of the image display of the still image proxy with respect to the template within a browser.	
28. The article of manufacture of claim 27 herein [sic] step (a), (c) and (d) occur at a central site, and step (b) occurs at a remote site, the method further comprising:	<i>See claim 4.</i>
(e) using a public or private network to communicate the browser-inserted still image proxy and the template from the central site to the remote site for manipulation at the remote site, and using a public or private network to communicate the information about the manipulations back to the central site for use in step (c).	
29. The article of manufacture of claim 28 wherein the network is a public network, and the public network is the Internet.	<i>See claim 5.</i>
31. The article of manufacture of claim 26 wherein step (a)	<i>See claim 7.</i>

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'149 Patent Claims	U.S. Patent No. 6,522,418 (“Chase et al.”)
further comprises dynamically creating the static template to represent the predetermined area that the electronic document must fit in a layout of a physical printed document.	
33. The article of the manufacture of claim 26 wherein the manipulations include a change in scaling percentage.	<i>See claim 9.</i>
34. The article of manufacture of claim 26 wherein the manipulations include alignment changes of the image display of the still image proxy in relation to the template.	<i>See claim 10.</i>
35. The article of manufacture of claim 25 wherein the PDL image file is a Postscript or PDF file.	<i>See claim 11.</i>
36. The article of manufacture of claim 25 wherein the still image proxy is a JPED [sic], GIF, or PNG file.	<i>See claim 12.</i>

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